

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

**INNOVATIVE GLOBAL SYSTEMS,  
LLC,**

**Plaintiff,**

**VS.**

**VOLVO CONSTRUCTION  
EQUIPMENT NORTH AMERICA, INC.,  
VOLVO TRUCKS NORTH AMERICA,  
INC., KOMATSU AMERICA CORP.,  
CATERPILLAR, INC., HYUNDAI  
CONSTRUCTION EQUIPMENT  
AMERICAS, INC., TOPCON TIERRA,  
STARTRAK SYSTEMS, LLC,  
WIRELESS MATRIX USA, LLC, JLG  
INDUSTRIES INC., TYLER  
TECHNOLOGIES, INC., GEOTAB,  
INC., and NAVISTAR, INC.,**

## Defendants.

**No. 6:10cv327 - LED**

## JURY TRIAL DEMANDED

**DEFENDANT KOMATSU AMERICA CORP.'S AND PLAINTIFF INNOVATIVE  
GLOBAL SYSTEMS, LLC'S AGREED MOTION TO EXTEND DEADLINE TO  
COMPLY WITH P.R. 3-3 and 3-4 AND DISCOVERY ORDER 2**

Defendant Komatsu America Corp. (“Komatsu”) and Plaintiff Innovative Global Systems, LLC (“IGS”) file this agreed motion to extend Komatsu’s deadline to comply with P.R. 3-3 and 3-4 and Discovery Order 2(B) [Docket Number 164] and any obligation of IGS to comply with Discovery Order 2(B) and (C) with respect to Komatsu as follows:

Komatsu requests that its deadline to comply with P.R. 3-4(a) and Discovery Order 2(B) be extended through and including January 31, 2011. IGS requests that any deadline for it to comply with Discovery Order 2(B) and (C) as to Komatsu be extended through and including the same date. The purpose of this extension is to determine whether the ongoing negotiations

regarding a resolution of Plaintiff's claims can be brought to fruition. Komatsu and IGS agree to the requested relief.

Dated: January 20, 2011

Respectfully submitted,

/s/ Ruffin B. Cordell [by MTC w permission]

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**ATTORNEYS FOR PLAINTIFF**  
**INNOVATIVE GLOBAL SYSTEMS, LLC**

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of this document has been served on all counsel of record via electronic mail through Local Rule CV-5(a) on this 20<sup>th</sup> day of January, 2011.

/s/ Michael T. Cooke